

REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
OFFICE OF THE CHIEF, ARMY RESERVE
WASHINGTON, DC 20310-2400

DAAR-OP (525)

MEMORANDUM FOR PRINCIPAL DEPUTY UNDERSECRETARY OF DEFENSE
(PERSONNEL AND READINESS), ATTN: COLONEL DREW,
4000 DEFENSE PENTAGON, WASHINGTON, DC 20310-4000

SUBJECT: Review of National Guard Report to The Congress of the United States of America
Weapons of Mass Destruction (WMD) Study dated 12 Oct 98.

1. The Office of the Chief, Army Reserve, provides the enclosed comments regarding the WMD Study dated 12 Oct 98. Although these comments are directed at one or more paragraphs in the study, these comments are applicable to the entire study, as the problems identified, including and new potential new roles are repeated throughout the entire document.
2. This draft report does not adequately address the capabilities of all of the Reserve Components with regard to responding to or training for a WMD incident. Recommend that SAIC coordinate the next draft of the study with the other Reserve Components. Each of the Reserve Components has unique and complimentary capabilities that should be leveraged to provide the most robust capabilities practically across the country.
3. The OCAR responsible official for this action is MAJ G. Alexander Crowther, commercial (703) 601-6014 or DSN 329-0614. Please contact him for more detailed information or assistance.

FOR THE CHIEF, ARMY RESERVE:

Encl

A handwritten signature in dark ink, appearing to read "J. Helmlly".

JAMES R. HELMLY
Brigadier General, USA
Deputy Chief, Army Reserve

a. Page iii, para Congressional Direction, line 6. "that the National Guard be assigned a new role, that of ~~countering~~ conducting anti-chemical and biological terrorism activities" Rationale: Counter terrorism is a singularly distinctive overt act designed to destroy or neutralize the terrorist's capabilities. USSOCOM is responsible for all counter terrorism operations for DoD.

b. Page iv, para 2, "These functions can include - ... providing emergency medical care while the consequences are stabilized and mitigated...providing mortuary assistance in the event of large numbers of deaths; providing potable water..." These are not traditional National Guard functions. The National Guard has the preponderance of the combat arms in the Army Reserve Components (RC) and the Combat Support/Combat Service Support (CS/CSS) competencies generally reside elsewhere.

c. Page v, para Study Objective. "that would result in a comprehensive domestic program that is fully integrated with the Federal, State, and local agencies involved with WMD" This draft study is not fully integrated with the capabilities of all seven Reserve Components and non-DoD Federal agencies.

d. Page vi: Tasks. Comment: The answers proposed on this page directly conflict with missions and roles already assigned. Specifically:

Task 1 - Roles and Responsibilities Definition. The Consequence Management Program Integration Office (CoMPIO) is responsible for assigning all RC roles and responsibilities, including those of the National Guard.

Task 2 - Threat Assessment. Per the Federal Response Plan (FRP) Basic Plan Paragraph VI - Responsibilities, the Department of Justice (DoJ) has responsibilities in CONUS. The military is specifically prohibited from gathering intelligence in CONUS. This comment also applies to page xxxii, Exhibit 7 Potential Roles and Actions.

Task 3 - Training. Training for first responders is a responsibility of DoJ. This comment also applies to page xxxii, Exhibit 7 Potential Roles and Actions.

Task 4 - Technology. Research, development, testing and evaluation is a mission at the Departmental level (HQDA, DoD), not at the staff level, (NGB, Director ARNG)

Task 5 - Response Plan. Emergency Support Function (ESF) #5 of the FRP gives the Federal Emergency Response Agency (FEMA) responsibility for planning.

e. Page xi: Para 4: "in particular the reserve ~~forces~~-components forces, can bring to bear to provide assistance."

f. Page xii, Para 4; page xxviii, Conclusion, bullet 5; page xxxii, Exhibit 7 Potential Roles and Actions. "Inadequate and inconsistent WMD Training": "There is no national standard relative to what constitutes appropriate training". "There is currently no standardization of WMD training". DoJ is responsible for training as of 01 Oct 99. Also, it is not up to any DoD agency to impose any standard on anyone outside of DoD, to include first responders.

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g. Page xii, Para 5 "Insufficient WMD equipment": "There is little consistency in the equipment currently stockpiled or planned to meet the needs of WMD response." These are a function assigned to CoMPIO. They are working the issue, attempting to create a consistent approach and attempting to obtain more equipment for stockpiles.

h. Page xiii, Para 4; page xxviii, Conclusions, bullet 3; page xxxii, Exhibit 7 Potential Roles and Actions. "Lack of Medical Preparedness": "There is little understanding of the magnitude of casualties that could result from a WMD incident, particularly a biological agent attack." ESF 8 of the FRP, Health and Medical Services, makes the Department of Health and Human Services (HHS) U.S. Public Health Service responsible for this.

i. Page xv, Exhibit 3: "Attack Management" Lack of medical preparedness is the responsibility of HHS. "Post Attack" Limited Mass Decon Facilities; Limited Graves Registration; Limited Mortuary Services; Limited Chaplain Support; Insufficient Water Supply. These are all logistics issues. The National Guard is a combat arms oriented organization. What CS/CSS the National Guard does possess is dedicated to the support of combat arms organizations. These issues require an orientation to CS/CSS missions. Other RC organizations possess this orientation.

j. Page xviii, Para 2, "There are numerous options relative to training roles that could be supported by the National Guard, ranging from the provision of training materials to the conduct of training at local, regional or national levels, particularly through the use of Distributive Training Technologies (DTT) and Reserve Component Automation system (RCAS)." These are aspects of training. Although military members are by definition trainers, and the National Guard has responsibility to train National Guard personnel, training is not a core competency of the National Guard.

k. Page xxvii, Para 2, "Additional areas such as response operations, medical preparedness, chemical and biological response capabilities have also emerged as extremely significant during the Study." These areas are extremely significant, and as such have already been covered in the FRP, and therefore do not need to be re-delegated in this study.

l. Page xxxiv Exhibit 7 Potential Roles and Actions. Communications Interoperability. FEMA is responsible to take the lead in ensuring communications interoperability on the interagency level. CoMPIO is responsible for integration at DoD.

m. Page xxxvi Task 1. Roles and Responsibilities Development. Comment: Roles and Responsibilities are very clearly defined in the FRP. Although one could make a case that the FRP needs to be updated, certainly there is no requirement for a complete overhaul of the roles and responsibilities as they stand now.

n. Page xxxvi Task 1. Roles and Responsibilities Development. One of the five methods used was the "Stakeholder Conferences". Recommend that we do not cite this method, as the methodology was flawed in that several organizations that have a stake in WMD operations were not invited to the conferences. This method can only function properly when all stakeholders are involved.

o. Pages xxxvii-xl. Exhibit A. Task Findings – Gaps and shortfalls and Derived Candidate Guard Roles. Twenty-nine of the roles do not meet the criteria of traditional National Guard Roles. Specifically:

Categories: 7, 71. The National Guard is not a financial organization. ESF #7 apportions resource support to GSA.

Categories: 9, 10. Simulations are not a core competency of the National Guard.

Categories: 21, 22. Threat Assessment. Per the FRP Basic Plan Paragraph VI – Responsibilities, the Department of Justice (DoJ) has responsibilities in CONUS. The military is specifically prohibited from gathering intelligence in CONUS.

Categories: 31, 32, 33, 35, 41. These are medical issues. Although the National Guard does possess medical units, medical operations are not a core competency of the National Guard.

Category: 43. FEMA is responsible for planning.

Categories: 53, 57. These are chemical issues. Although the National Guard does possess chemical units, chemical operations are not a core competency of the National Guard.

Categories: 46, 60, 61, 66, 67, 68. These are logistics issues. The National Guard is a combat arms oriented organization. What CS/CSS the National Guard does possess is dedicated to the support of combat arms organizations. These issues require an orientation to CS/CSS missions. Other RC organizations possess this orientation.

Categories: 69, 72, 73, 74, 75, 76, 77, 78, 79. These are aspects of training. Although all military members are by definition trainers, training is not a core competency of the National Guard.